

REMARKS

Applicant has thoroughly considered the Examiner's remarks and the application has been amended to more clearly recite the invention. Claims 1-3, 5, 7, 9, 10, 12, 13, 15-17 and 19-20 are presented in the application for further examination. Claims 1, 9, 12, 13, 16 and 19 have been amended by this Amendment A. Reconsideration of the application claims as amended and in view of the following remarks is respectfully requested.

Provisional Double Patenting Rejection

The claims have been provisionally rejected based on copending application 10/000,680 (incorrectly noted in the Office action as 10/059,810). In view of the claim amendments, Applicant submits that the claims are patentably distinct over the copending application so that the rejection should be withdrawn. For example, the claims of the copending application relate to a fulfillment program which is not recited by the claims of this application. Also, the claims of this application relate to a processor at a designated location which is not recited by the claims of the copending application. Thus, this provisional rejection is moot and should be withdrawn in view of the claim amendments.

Rejections Under §112

Claims 9 and 12 have been amended to delete "and/or" so that the rejection should be withdrawn.

Rejections Under §102(e) and §103(a)

Claims 1, 2, 8, 16 and 17 stand rejected under 35 USC § 102(e) as being anticipated by Karas (20020103711 A1). Claim 3 stands rejected under 35 USC §103(a) as being unpatentable over Karas. Claims 5, 9, 10, 12-14, 19 and 20 stand rejected under 35 USC §103(a) as being unpatentable over Karas in view of Stoltz (20020095576 A1). Stoltz is cited as teaching examples of the claimed certificates. Claims 7 and 15 stand rejected under 35 USC §103(a) as being unpatentable over Karas in view of Stoltz in view of Dubbels (6,222,634 B1). Dubbels is cited as teaching plug-ins for printing web pages.

Applicant submits that the amended claims are patentable because the claims recite the following, in combination:

- (1) a processor of customer, participant or their agent executes software to render the motivation package;
- (2) a print location is designated by the customer;
- (3) an electronic version of the motivation package is transmitted via the Internet to the processor; and
- (4) the customer, website and processor are connected via the Internet.

These four aspects noted above in combination recite a very different invention than the combination of Karas, Stoltz and Dubbels. According the recited claims, the system, method and components of the invention permit a customer using the website to designate a processor at a print location for rendering an electronic version of the motivation package, all via the Internet. Thus, the need for a printing system as required by Karas is eliminated and the invention is much more flexible. Stoltz and Dubbels relate to types of certificates and plug-ins, respectively, and do not correct this deficiency of Karas. The following remarks will address these distinctions in detail.

(1) A PROCESSOR OF CUSTOMER, PARTICIPANT OR THEIR AGENT, NOT IN THE CITED ART, EXECUTES SOFTWARE TO RENDER THE MOTIVATION PACKAGE.

In Karas, the gift-gram is printed by a printing system 24 and a hard copy mailed to the recipient; in contrast, the processor of the customer, participant or their agent executes software to create the hard copy. Karas contemplates that the printing system is connected to and part of the server and controlled by the administrator of the server. Karas contemplates that a limited number of Western Union type locations would have printing systems 24 which would generate the hard copy gift-gram and mail it. Thus, Karas teaches away from the invention and in particular teaches away from employing a processor of customer, participant or their agent to receive an electronic version of the motivation package which is rendered to hard copy. In other words, the processor located at the hard copy delivery site is a missing element of Karas.

In the claimed invention, a processor of customer, participant or their agent executes software to render the motivation package for presentation—a very different system as compared

to Karas. In particular, each independent claim recites a processor of the customer, participant or an agent thereof, as follows:

Claim 1:

a **processor** at the customer designated print location, said processor associated with at least one of the customer, the participant, an agent of the customer and an agent of the participant, said processor executing a second program for receiving from the website via the Internet the transmitted, electronic version, said second program for rendering the transmitted, electronic version of the selected motivation package including the particular motivation document and the particular motivation award to a printer for printing the motivation package so that the printed motivation package is capable of being presented off-line to the participant.

Claim 9:

designate a printing location associated with at least one of the customer, the participant, an agent of the customer and an agent of the participant, ... a **processor** at the designated print location executes a second application program, receives the assembled specification and renders the specification to a printer or monitor of the customer or participant.

Claim 12:

a **processor** of the customer, the participant or an agent of customer or participant at a print location designated by the customer, said processor executing software for printing the selected motivation document and the selected motivation award at the print location wherein the selected motivation document includes text indicating at least one of the motivation and text indicating the participant's name, such text being optionally designated by the customer.

Claim 16:

a **processor** of the customer, the participant or an agent of customer or participant at a print location designated by the customer, said processor executing software for printing the selected motivation document and the selected motivation award at the print location wherein the selected motivation document includes text indicating at least one of the motivation and text indicating the participant's name, such text being optionally designated by the customer.

Claim 19:

a **processor** at a print location designated by the customer or participant; and a print component executed by the processor for rendering the transmitted, created specifications....

Stoltz and Dubbels relate to types of certificates and plug-ins, respectively, and do not correct this deficiency of Karas.

In summary, each of the independent claims and each of the dependent claims by their dependency recite a processor of the customer, participant or their agent, a feature not in the prior art. The rejections based on Karas, Stoltz and Dubbels, either separately or in combination, under §§102 and 103 should be withdrawn.

(2) THE PRINT LOCATION IS DESIGNATED BY THE CUSTOMER, NOT BASED ON THE LOCATION OF THE PRINTING SYSTEM OF KARAS.

The print location cannot be designated by the sender in Karas because in Karas the sender designates the recipient and the administrator of the server controls and determines the location of the printing system 24. In fact, it appears in Karas that only one printing system 24 is contemplated since Karas teaches that the gift-gram must be mailed to the recipient because the designated recipient is at a different location than the printing system 24.

In the claimed invention, the print location is designated by the customer and corresponds to a location of the customer, participant or agent, not based on the location of the administrator's printing system so that the invention provides great flexibility—a very different system as compared to Karas. In particular, each independent claim recites that the print location is designated by the customer, as follows:

Claim 1:

a processor at a print location **designated** by the customer....

Claim 9:

allowing the customer to **designate** a printing location associated with at least one of the customer, the participant, an agent of the customer and an agent of the participant, wherein the printing location is remote from the website....

Claim 12:

a print location **designated** by the customer....

Claim 16:

receiving a second user signal representing a selection, by the user with the user interface selection device, of a print function including a remote print location **designated** by the customer....

Claim 19:

a print component executed by the processor for rendering the transmitted, created specifications at the print location **designated** by the customer or participant for presentation to the participant...

Stoltz and Dubbels relate to types of certificates and plug-ins, respectively, and do not correct this deficiency of Karas.

In summary, each of the independent claims and each of the dependent claims by their dependency recite that the print location is designated by the customer, a feature not in the prior art. The rejections based on Karas, Stoltz and Dubbels, either separately or in combination, under §§102 and 103 should be withdrawn.

(3) THE ELECTRONIC VERSION OF THE MOTIVATION PACKAGE IS TRANSMITTED VIA THE INTERNET TO THE PROCESSOR; IN CONTRAST, KARAS TEACHES TRANSMITTING DATA TO FILL FIELDS.

According to the invention, an electronic version is transmitted via the Internet to the processor for rendering at the customer designated location. In Karas, only data to fill in fields are transmitted via a separate connection between the server and the printing system of the administrator (see [0035]).

In the claimed invention, the electronic version is transmitted to whatever location is specified by the customer or participant so that the invention provides great flexibility--a very different system as compared to Karas. In particular, each independent claim recites that the electronic version is transmitted, as follows:

Claim 1:

a first program associated with the website:

for creating an electronic version of the selected motivation package including the particular motivation document and the particular motivation award to be transmitted to the customer, the participant, or an agent of the customer or participant, and

for transmitting the created electronic version via the Internet to a processor at a print location designated by the customer....

Claim 9:

allowing the customer to print the selected motivation package at the designated printing location wherein the selected motivation document and the award includes customized text relating to motivation of the participant and text indicating the name of the participant receiving the motivation package, wherein the website includes a first application program for assembling a specification representing the selected motivation package and for transmitting the assembled specification via the Internet....

Claim 12:

software responsive to the customer's on-line selections for transmitting the selected motivation document and the selected motivation award via the Internet to a processor of the customer, the participant or an agent of customer or participant at a print location designated by the customer....

Claim 16:

in response to the second user signal, executing software to transmit the electronic version via the Internet to a processor of the customer, the participant or an agent of customer or participant at a print location designated by the customer, said processor executing software for printing the selected motivation document and the selected motivation award at the print location

Claim 19:

an interface component for accepting the created specifications from the generation component and transmitting via the Internet the created specifications to a processor at a print location designated by the customer or participant....

Stoltz and Dubbels relate to types of certificates and plug-ins, respectively, and do not correct this deficiency of Karas.

In summary, each of the independent claims and each of the dependent claims by their dependency recite transmitting an electronic version, a feature not in the prior art. The rejections based on Karas, Stoltz and Dubbels, either separately or in combination, under §§102 and 103 should be withdrawn.

(4) THE CUSTOMER, WEBSITE AND PROCESSOR ARE CONNECTED VIA THE INTERNET. IN KARAS, THE PRINTING SYSTEM IS SEPARATELY CONNECTED TO THE SERVER.

According to Karas, the connection between sender and server is the Internet and connection between server and printing system is a separate link; in the claimed invention, the Internet connects customer, website and participant. Step D of Karas illustrates a separate and independent connection from the server 22 to the printing system 24 as compared to the Internet connection between the sender and the server 22. This is because Karas does not contemplate that the printing system 24 could be a processor of the customer, participant or their agent.

In the claimed invention, the Internet links the customer, website and processor so that the invention provides great flexibility and avoids the need for mailing a hard copy as taught by Karas--a very different system as compared to Karas. In particular, each independent claim recites such Internet linking, as follows:

Claim 1:

said website accessible by a customer via the **Internet**, ...

a first program associated with the website:

for creating an electronic version of the selected motivation package including the particular motivation document and the particular motivation award to be transmitted to the customer, the participant, or an agent of the customer or participant, and

for transmitting the created electronic version via the **Internet** to a processor at a print location designated by the customer; and

a processor at the customer designated print location, said processor associated with at least one of the customer, the participant, an agent of the customer and an agent of the participant, said processor executing a second program for receiving from the website via the **Internet** the transmitted, electronic version....

Claim 9:

allowing the customer to designate a printing location associated with at least one of the customer, the participant, an agent of the customer and an agent of the participant, wherein the printing location is remote from the website and linked to the website via the **Internet**; ...

wherein the website includes a first application program for assembling a specification representing the selected motivation package and for transmitting the assembled specification via the **Internet**....

Claim 12:

a website accessible on-line via the **Internet** by the customer for allowing the customer to select one of the motivation documents and to select at least one of the motivation awards to be presented to the participant as the integrated motivation package; software responsive to the customer's on-line selections for transmitting the selected motivation document and the selected motivation award via the **Internet** to a processor of the customer, the participant or an agent of customer or participant at a print location designated by the customer....

Claim 16:

receiving a second user signal representing a selection, by the user with the user interface selection device, of a print function including a remote print location designated by the customer accessible via the **Internet**; and
in response to the second user signal, executing software to transmit the electronic version via the **Internet** to a processor of the customer, the participant or an agent of customer or participant at a print location designated by the customer....

Claim 19:

a generation component for creating the specifications associated with a selected motivation package selected by the customer via the **Internet** from a plurality of motivation packages, each including a motivation document and a motivation award;
an interface component for accepting the created specifications from the generation component and transmitting via the **Internet** the created specifications to a processor at a print location designated by the customer or participant....

Stoltz and Dubbels relate to types of certificates and plug-ins, respectively, and do not correct this deficiency of Karas.

In summary, each of the independent claims and each of the dependent claims by their dependency recite that the Internet connects the customer, website and processor, a feature not in the prior art. The rejections based on Karas, Stoltz and Dubbels, either separately or in combination, under §§102 and 103 should be withdrawn.

It is felt that a full and complete response has been made to the Office action and, as such, places the application in condition for allowance. Such allowance is hereby respectfully requested. If the Examiner feels, for any reason, that a personal interview will expedite the prosecution of this application, he is invited to telephone the undersigned.

The Applicant wishes to expedite prosecution of this application. If the Examiner deems the application as amended to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the application in condition for allowance.

If there are any additional charges in this matter, please charge Deposit Account No. 19-1345.

Respectfully submitted,

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